

Navilyst Medical, Inc.

Re: NMI PICC III, Special 510(k)

510(k) SUMMARY FOR THE NMI PICC III

Date prepared: 22-October 2013

A. Sponsor

Navilyst Medical, Inc
26 Forest Street
Marlborough, MA 01752

B. Contact

Brandon M. Brackett
Specialist, Global Regulatory Affairs
508-658-7984

NOV 20 2013

OR

Wanda Carpinella
Director, Global Regulatory Affairs
508-658-7929

C. Device Name

Trade Name	NMI PICC III
Common/Usual name:	Peripherally Inserted Central Catheter (PICC)
Classification Name:	Short and Long-Term Intravascular Catheter, (21CFR§880.5970, Class II)
Classification Panel:	General Hospital

D. Predicate Device

Common/Usual name:	Peripherally Inserted Central Catheter (PICC)
Classification Name	Percutaneous, Implanted, Long-Term Intravascular Catheter 21CFR§880.5970, Class II
Classification Panel:	General Hospital
Premarket Notification	K131942 (NMI PICC III and NMI HPICC III)

E. Device Description**Intended Use**

The NMI PICC III is indicated for short- or long-term peripheral access to the central venous system for intravenous therapy, including but not limited to, the administration of fluids, medications and nutrients, the sampling of blood, for central venous pressure monitoring and for power injection of contrast media.

Maximum Power Injection Flow Rate	
Description	Flow Rate
4F Single Lumen – 55cm length	3.5 mL/sec
5F Single Lumen – 55cm length	5 mL/sec
5F Dual Lumen – 55 cm length	4 mL/sec
6F Dual Lumen – 55cm length	5 mL/sec

F. Summary of Similarities and Differences in Technological Characteristics and Performance

The proposed device incorporates identical materials, design, components and technological characteristics as the predicate intravascular catheters.

In brief, both the proposed and predicate devices are:

- intended for short- or long-term peripheral access to the central venous system for intravenous therapy, blood sampling, for central venous pressure monitoring and power injection of contrast media;
- available in single and multi-lumen configurations in a wide range of sized from 4F to 6F outside catheter diameter;
- rated for maximum power injector settings up to 325 psi;
- rated for maximum power injection flow rate up to 5 ml/second based on model;
- available kitted with a range of procedural accessories for user convenience; and,
- demonstrate resistance to blood components (platelet and thrombus) accumulation.

G. Performance Data

The NMI PICC III is substantially equivalent to Navilyst predicate devices based on comparison of technological characteristics and the results of non-clinical tests which included the performance evaluation conducted in accordance with the following FDA guidance documents, international standards, and testing which included:

- EN ISO 10555-1:2009, *Sterile, Single use intravascular catheters – Part 1: General Requirements*
- EN ISO 10555-3:1997 Corrigendum 1:2002, *Sterile, Single-Use Intravascular Catheters – Part 3: Central Venous Catheters*
- FDA's "Guidance on Premarket Notification [510(K)] Submissions for Short-Term and Long-Term Intravascular Catheters dated March 16, 1995"
- Gravity Flow Rate
- Priming Volume

H. Conclusion

The results of the non-clinical testing and a comparison of similarities and differences demonstrate that the proposed and predicate devices are substantially equivalent.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
10903 New Hampshire Avenue
Document Control Center - WO66-G609
Silver Spring, MD 20993-0002

November 20, 2013

Navilyst Medical, Incorporated
Mr. Brandon M. Brackett
Specialist, Global Regulatory Affairs
26 Forest Street
MARLBOROUGH MA 01752

Re: K133264
Trade/Device Name: NMI PICC III
Regulation Number: 21 CFR 880.5970
Regulation Name: Percutaneous, Implanted, Long-Term Intravascular Catheter
Regulatory Class: II
Product Code: LJS
Dated: October 22, 2013
Received: October 23, 2013

Dear Mr. Brackett:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA).

You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,

Kwame O.
Ullmer

for

Erin Keith M.S.
Acting Division Director
Division of Anesthesiology, General Hospital,
Respiratory, Infection Control and
Dental Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

Indications for Use

510(k) Number (if known)
K133264

Device Name
NMI PICC III

Indications for Use (Describe)

The NMI PICC III is indicated for short- or long-term peripheral access to the central venous system for intravenous therapy, including but not limited to, the administration of fluids, medications and nutrients, the sampling of blood, for central venous pressure monitoring and for power injection of contrast media.

Maximum Power Injection Flow Rate

Description Flow Rate

4F Single Lumen – 55cm length 3.5 mL/sec
5F Single Lumen – 55cm length 5 mL/sec
5F Dual Lumen – 55 cm length 4 mL/sec
6F Dual Lumen – 55cm length 5 mL/sec

Type of Use (Select one or both, as applicable)

☒ Prescription Use (Part 21 CFR 801 Subpart D)

☐ Over-The-Counter Use (21 CFR 801 Subpart C)

PLEASE DO NOT WRITE BELOW THIS LINE – CONTINUE ON A SEPARATE PAGE IF NEEDED.

FOR FDA USE ONLY

Concurrence of Center for Devices and Radiological Health (CDRH) (Signature)



Digitally signed by Richard C.
Chapman

Date: 2013.11.19 15:41:37 -05'00'